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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 RACHELLE CRUPI, individually, and as
12 Special Administrator, Personal Representative,
and heir to the Estate of ALETHA PORCARO,
deceased.

13 Plaintiff,

14 || VS.

15 THE HEIGHTS OF SUMMERLIN, LLC, a
16 foreign limited liability corporation; SUMMIT
17 CARE, LLC, a foreign limited liability
corporation; GENESIS HEALTHCARE, INC., a
18 domestic corporation, LATOYA DAVIS,
individually and as Administrator; ANDREW
19 REESE, individually and as Administrator; DOE
EMPLOYEES I through X; DOE SERVICE
20 PROVIDERS I through X, DOE GOVERNING
MEMBERS I through X; ROE GOVERNING
21 BODIES I through X; and DOES XI through
XX; and ROE CORPORATIONS XI through
22 XX, inclusive.

23 Defendants

CASE NO. 2:21-cv-00954-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
MOTION TO REMAND**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between the parties hereto, through their respective
counsel of record, that the deadline for Plaintiff Rachelle Crupi, individually, and as Special
Administrator, Personal Representative, and heir to the Estate of Aletha Porcaro, deceased, to file its

1 reply to Defendants' Opposition to Plaintiff's Motion to Remand (ECF No. 34, filed on June 28,
2 2021), currently due July 5, 2021, be extended through July 12, 2021.

3 This is Plaintiff's first request for an extension and this stipulation is submitted in good faith
4 without the purpose of undue delay.

5 DATED this 2nd day of July, 2021.

DATED this 2nd day of July, 2021.

6 HENNESS & HAIGHT

MESSNER REEVES LLP

7
8 /s/ Genevieve Romand, Esq..
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Summerlin, LLC, Latoya Davis, Andrew Reese,
14 Summit Care, LLC, and Genesis Healthcare,
Inc.
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18 IT IS SO ORDERED *nunc pro tunc*.

19 Dated this 6 day of July, 2021.

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Gloria M. Navarro, District Judge
23 UNITED STATES DISTRICT COURT
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